

REMARKS

The application has been carefully reviewed in light of the Office Action dated November 3, 2005. Claims 1 and 16 have been amended. Claims 1-7, 9-12 and 14-16 remain pending in this case. Applicant reserves the right to pursue the original claims in this application and in other applications.

Claims 1-7, 11, 12, 14, 15 and 16 stand rejected under 35 U.S.C. § 103(a) as being unpatentable over Grenning et al. (U.S. Patent No. 5,706,333) in view of Moore et al. (U.S. Patent No. 4,697,243). Applicant respectfully traverses the rejection.

Claim 1 recites a computer-implemented method for troubleshooting a problem associated with a cellular network site, comprising, *inter alia*, receiving a symptom input describing the symptoms of the problem associated with a cellular network site.

Claim 11 recites an expert system for troubleshooting a problem in a cellular network site, the expert system comprising, *inter alia*, a domain database, wherein the domain database comprises a plurality of facts regarding the cellular network site.

Claim 16 recites a computer-readable medium having computer-executable instructions which, when executed on a computer, cause the computer to perform a method for troubleshooting a problem associated with a cellular network site, the method comprising, *inter alia*, receiving a symptom input describing the symptoms of the problem associated with a cellular network site.

Grenning discloses a test system controller and a plurality of measurement units. Measurement units are installed where they can monitor radio transmissions to and from cellular telephones. The measurement units measure parameters of the signals transmitted by the base station and cellular telephones. The measured parameters are passed to a test system controller. The test system controller compares the measured values to acceptable limits and stored information to detect faulty equipment. See Grenning column 2, lines 32-41. Grenning also discloses a system the provided telephone fault conclusions of three types. Some conclusions indicate a fault is present. Other conclusions indicate a fault is suspected. When faults relating to a cellular telephone are indicated as present, the conclusion is passed to the trouble manager. When a fault relating to a cellular telephone is suspected, the conclusion is used to include the

MIN on the list of MINs for high priority monitoring. The third type of conclusion relates to the cellular network. These are intermediate conclusions used in diagnosing specific MINs. See Grenning column 17, lines 37-47.

Moore discloses an Expert system 22 includes a knowledge base 28 of elevator troubleshooting information and an inference engine 30. Moore discloses that the inference engine 30 contains domain independent rules which control the selection and application of the domain dependent rules. The inference engine 30 builds a network of domain dependent rules which propagates belief in hypotheses to arrive at a probable cause of malfunction symptoms input to the system 22 by a user. See Moore column 4, lines 12-28. Moore also discloses a function which performs an interactive session with the user, in which the expert system asks the user for specific information or evidence, as required by the evidence-hypothesis format of the knowledge based rules, until a possible cause of the malfunction symptom is identified. The expert system will display the possible cause, the confidence factor in the belief that this is the cause, as well as a suggested corrective action.

The Office Action fails to establish a *prima facie* case of obviousness for the subject matter of claims 1, 11, and 16. Courts have generally recognized that a showing of a *prima facie* case of obviousness necessitates three requirements: (i) some suggestion or motivation, whether in the references themselves or in the knowledge of a person of ordinary skill in the art to modify the reference or combine the reference teachings; (ii) a reasonable expectation of success; and (iii) the prior art references must teach or suggest all claim limitations. See e.g., In re Dembiczak, 175 F.3d 994 (Fed. Cir 1999); In re Rouffet, 149 F.3d 1350, 1355 (Fed. Cir. 1998); Pro-Mold & Tool Co. v. Great Lakes Plastics, Inc., 75 F.3d 1568, 1573 (Fed. Cir. 1996). The references used in the Office Action fail at least the third prong of obviousness in that the prior art references do not teach or suggest all claim limitations.

The combination of Grenning and Moore fails to disclose all the recitations of claims 1, 11 and 16. Specifically, the combination fails to disclose a computer-implemented method for troubleshooting a problem associated with a cellular network site, comprising receiving a symptom input describing the symptoms of the problem associated with a cellular network site, as recited in claim 1.

Also, the combination fails to disclose an expert system for troubleshooting a problem in a cellular network site, the expert system comprising a domain database, wherein the domain database comprises a plurality of facts regarding the cellular network site, as recited in claim 11. The combination fails to disclose a computer-readable medium having computer-executable instructions which, when executed on a computer, cause the computer to perform a method for troubleshooting a problem associated with a cellular network site, the method comprising, receiving a symptom input describing the symptoms of the problem associated with a cellular network site, as recited in claim 16. Neither Grenning nor Moore discloses troubleshooting a cellular network site. To the contrary, Grenning merely discloses potential faults in a cellular telephone, not a cellular network site. See Grenning column 17, lines 37-47. Moore is directed to servicing elevators. Accordingly, the rejection of claims 1, 11 and 16 should be withdrawn.

In addition, Applicant submits that the Moore reference is a non-analogous reference which cannot be rightly combined with Grenning. Moore is directed to servicing elevators which requires knowledge of mechanical components, power systems and statics among other things, and not cellular transmissions, problems arising at a cellular network site or even telecommunications in general. Applicants submit the knowledge requirements for Grenning and Moore are not analogous. Therefore, the combination of Grenning and Moore is improper.

In addition, Grenning and Moore employ different diagnosing tactics which and provide no motivation for their combination. Grenning allows the user to respond to questions using a rules based expert system. See Grenning column 16, lines 25-28. Moore discloses a system in which the user input symptoms and uses an evidence-hypothesis format. See Moore column 6, lines 55-60.

Claims 2-7, 9 and 10 depend directly or indirectly from claim 1, and claims 12, 14 and 15 depend from claim 11 and are allowable along with claims 1 and 11, respectively, for the reasons mentioned above and on their own merit.


CONCLUSION

In view of the above, each of the presently pending claims in this application is believed to be in immediate condition for allowance. Accordingly, the Examiner is respectfully requested to pass this application to issue. If the Examiner believes a telephone conference would advance the prosecution of this application, the Examiner is invited to telephone the undersigned please contact Applicants' undersigned attorney at 404.954.5040.

Please charge any additional fees or credit any overpayment to Deposit Account No. 13-2725.

Respectfully submitted,
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